

**BARRACK, RODOS & BACINE**

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**UNITED STATES BANKRUPTCY COURT  
NORTHERN DISTRICT OF CALIFORNIA  
SAN FRANCISCO DIVISION**

In re:

PG&E CORPORATION

- and -

PACIFIC GAS AND ELECTRIC  
COMPANY,

Debtors.

- ☒ Affects Both Debtors  
☐ Affects PG&E Corporation  
☐ Affects Pacific Gas and Electric  
Company

Case No. 19-30088 (DM) (Lead Case)

Chapter 11

(Jointly Administered)

**JOINDER OF THE LABORERS' AND  
RETIREMENT BOARD EMPLOYEES'  
ANNUITY AND BENEFIT FUND OF  
CHICAGO TO SECURITIES LEAD  
PLAINTIFF'S OBJECTION TO  
REORGANIZED DEBTORS' MOTION TO  
APPROVE SECURITIES ADR AND  
RELATED PROCEDURES FOR  
RESOLVING SUBORDINATED  
SECURITIES CLAIMS [D.I. 9189]**

1 The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of Chicago,  
2 the holder of a Securities Claim<sup>1</sup> and a creditor in the chapter 11 bankruptcy cases (the "**Chapter**  
3 **11 Cases**") of the above-captioned reorganized debtors (the "**Debtors**", or as reorganized  
4 pursuant to the Plan, the "**Reorganized Debtors**"), by and through its undersigned counsel,  
5 submits this joinder ("**Joinder**") to *Securities Lead Plaintiff's Objection to Reorganized*  
6 *Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving Subordinated*  
7 *Securities Claims* [Docket No. 9189] (the "**Securities ADR Objection**"), in opposition to  
8 *Reorganized Debtors' Motion to Approve Securities ADR and Related Procedures for Resolving*  
9 *Subordinated Securities Claims* [Docket No. 8964] (the "**Securities ADR Motion**"). In support  
10 of this Joinder, the Laborers' and Retirement Board Employees' Annuity and Benefit Fund of  
11 Chicago, respectfully states as follows:  
12

#### 13 **JOINDER AND RESERVATION OF RIGHTS**

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15 1. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of  
16 Chicago is a Securities Claimant and timely filed proofs of claim against the Debtors by the  
17 Extended Bar Date (Claim Nos. JGJVP27423 and HISVA27423).

18 2. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of  
19 Chicago incorporates by reference and hereby joins in all arguments set forth in the Securities  
20 ADR Objection.  
21

22 3. The Laborers' and Retirement Board Employees' Annuity and Benefit Fund of  
23 Chicago reserves its right to supplement this Joinder and further reserves its rights to participate  
24 in any hearing to consider the Securities ADR Motion, including its rights to make any  
25 arguments and to examine witnesses.

26 <sup>1</sup> Capitalized terms not defined herein shall have the meaning ascribed to them in the Securities  
27 ADR Objection (as defined herein) and the Securities ADR Motion (as defined herein), as  
28 applicable.

1 **CONCLUSION**

2 For all of the foregoing reasons, the Laborers' and Retirement Board Employees'  
3 Annuity and Benefit Fund of Chicago respectfully requests that this Court enter an Order  
4 denying the Securities ADR Motion and granting such other and further relief as may be just and  
5 proper.  
6

7 Dated: October 6, 2020

**BARRACK, RODOS & BACINE**

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